



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

REYNALDO VINCENTE PALAZUELOS,
aka "Rey Martinez,"

Defendant.

Case No. 2:23-cr-00587-JFW

I N D I C T M E N T

[18 U.S.C. § 922(g)(1): Felon in Possession of Ammunition; 18 U.S.C. § 924 and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

[18 U.S.C. § 922(g)(1)]

On or about August 13, 2022, in Ventura County, within the Central District of California, defendant REYNALDO VINCENTE PALAZUELOS, also known as "Rey Martinez," knowingly possessed ammunition, namely, three rounds of Remington 9mm caliber ammunition, one round of Federal Cartridge Company 9mm caliber ammunition, one round of Arms Corporation 9mm caliber ammunition, and one round of Igman Zavod 9mm caliber ammunition, all contained inside a privately manufactured 9mm Luger pistol bearing no serial number (commonly referred to as a "ghost gun"), each in and affecting interstate and foreign commerce.

1 Defendant PALAZUELOS possessed such ammunition knowing that he
2 had previously been convicted of at least one of the following felony
3 crimes, each punishable by a term of imprisonment exceeding one year:

4 1. Robbery, in violation of California Penal Code Section
5 211, in the Superior Court of the State of California, County of
6 Ventura, Case Number CR43648, on or about June 24, 1998;

7 2. Attempted Murder with a Firearm, in violation of California
8 Penal Code Sections 664 and 187(a), in the Superior Court of the
9 State of California, County of Ventura, Case Number 2006002501, on or
10 about April 12, 2007; and

11 3. Prisoner Manufacturing a Weapon, in violation of California
12 Penal Code Section 4502(b), in the Superior Court of the State of
13 California, County of Monterey, Case Number SS161464A, on or about
14 December 14, 2016.

FORFEITURE ALLEGATION

[18 U.S.C. § 924 and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), in the event of defendant's conviction of the offense set forth in this Indictment.

2. If so convicted, the defendant shall forfeit to the United States of America the following:

(a) All right, title, and interest in any firearm or ammunition involved in or used in such offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been

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1 placed beyond the jurisdiction of the court; (d) has been
2 substantially diminished in value; or (e) has been commingled with
3 other property that cannot be divided without difficulty.

4
5 A TRUE BILL

6
7 /s/
8 Foreperson

9 E. MARTIN ESTRADA
10 United States Attorney

11 MACK E. JENKINS
12 Assistant United States Attorney
13 Chief, Criminal Division



14 SCOTT M. GARRINGER
15 Assistant United States Attorney
16 Deputy Chief, Criminal Division

17 IAN V. YANNIELLO
18 Assistant United States Attorney
19 Deputy Chief, General Crimes
20 Section

21 DEREK R. FLORES
22 Assistant United States Attorney
23 General Crimes Section
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